

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

FIELDTURF USA, INC., ET AL.)	
)	CASE NO.: 1:06CV2624
Plaintiffs,)	
)	Judge Patricia A. Gaughan
v.)	
)	
SPORTS CONSTRUCTION GROUP,)	
LLC, ET AL.)	
)	
Defendants.)	

**FIELDTURF’S SUPPLEMENTATION/REASSERTION OF ITS FIRST MOTION TO
COMPEL DISCOVERY AND FOR SANCTIONS FILED IN JUNE 12, 2007**

Plaintiffs, FieldTurf USA, Inc. and FieldTurf Tarkett Inc. (collectively “FieldTurf”), hereby respectfully reassert its Motion to Compel filed back in June 12, 2007 (Doc. No. 60) in its entirety and without modification.

In accord with this Court’s directives given during the course of the in-person Status Conference conducted on September 6, 2007, FieldTurf was granted leave to supplement its Brief in support of its Motion to Compel to reflect any changes in the status of the issues raised therein. Unfortunately, after repeated attempts by FieldTurf to resolve at least “some” of the non-responsive discovery responses by the Defendant, the situation has not changed one bit. Indeed, the Defendant has continued with its delaying posturing by failing to provide any responsive documents relative to the identified “Document Requests,” or to provide responsive answers to any of the “Interrogatories” raised in FieldTurf’s Motion and supporting Brief.

In view of the above, FieldTurf respectfully requests this Honorable Court to consider its originally filed Motion to Compel in its entirety and without modification. FieldTurf further asks this Court to consider the additional time, effort and money it has spent in diligently trying,

and trying to obtain that which it is rightfully entitled to in the way of discovery. Sanctions are clearly warranted and respectfully requested. Enough is enough.

Respectfully submitted,

Date: September 24, 2007

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CERTIFICATE OF SERVICE

I, Micheal D. Lake, hereby certify that on this 24th day of September 2007, a copy of the foregoing document entitled, **“FIELDTURF’S SUPPLEMENTATION/REASSERTION OF ITS FIRST MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS FILED IN JUNE 12, 2007”** was filed electronically via the Court’s ECF/CM System. Notice of this filing will be sent by operation of the Court’s electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court’s system.

s/ Micheal D. Lake
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